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and Live Nation Entertainment, Inc.*

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DEREK HANSEN, as an individual, on behalf  
of himself, the general public and those  
similarly situated.

**Plaintiff,**

V.

TICKETMASTER ENTERTAINMENT, INC.  
and LIVE NATION ENTERTAINMENT CO.

#### Defendants.

Case No. 3:20-cv-02685-EMC

**JOINT STIPULATION AND  
~~(PROPOSED)~~ ORDER SETTING  
BRIEFING SCHEDULE AND  
CONTINUING CASE MANAGEMENT  
CONFERENCE**

[Civil Local Rule 6-2]

Assigned to: Honorable Edward M. Chen

1           Defendants Live Nation Entertainment, Inc. and Ticketmaster LLC<sup>1</sup> (together,  
 2 "Defendants") and Plaintiff Derek Hansen hereby stipulate and agree, through their undersigned  
 3 counsel and pursuant to Civil Local Rule 6-2, to the following schedule, subject to the approval of  
 4 the Court. In support of this joint stipulation, the parties state as follows:

5           1. Plaintiff filed his Complaint on April 17, 2020. ECF No. 1.

6           2. On May 5, 2020, pursuant to Local Rule 6-1(a), the parties filed a joint stipulation  
 7 that extended Defendants' time to answer or otherwise respond to the Complaint from May 12,  
 8 2020 to June 11, 2020. ECF No. 14.

9           3. Defendants, after reviewing the allegations in the Complaint and conducting an  
 10 initial investigation of the claims therein, have determined that they will move to compel  
 11 arbitration on the ground that Plaintiff's claims are subject to a mandatory arbitration provision.  
 12 Plaintiff intends to oppose that motion. If that motion is unsuccessful, Defendants also intend to  
 13 file a motion to dismiss, which Plaintiff will oppose.

14          4. The parties have conferred and agree that, while the motion to compel arbitration  
 15 is pending, it would be premature to brief and litigate a motion to dismiss. To that end, in the  
 16 interest of promoting the most efficient use of the parties' and the Court's resources, the parties  
 17 have agreed to (1) brief and resolve Defendants' motion to compel arbitration before litigating any  
 18 motion to dismiss, and (2) continue the initial case management conference, which is currently  
 19 scheduled for August 6, 2020, to give the Court a chance to rule on Defendants' motion to compel  
 20 arbitration before holding the conference.

21          5. The parties have therefore agreed to the following briefing schedule:

- 22           a. Defendants shall file their motion to compel arbitration on or before June 29,  
                2020.
- 23           b. Plaintiff shall file any opposition on or before July 29, 2020.
- 24           c. Defendants shall file any reply on or before August 28, 2020.

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 28          <sup>1</sup> Defendants Ticketmaster LLC and Live Nation Entertainment, Inc. were incorrectly sued as  
                Ticketmaster Entertainment, Inc. and Live Nation Entertainment Co.

1                   d. Subject to the Court's availability, any hearing on Defendants' motion to  
2                   compel arbitration shall be held on October 8, 2020, or as soon thereafter as the  
3                   Court's calendar allows.

4                   e. Defendants need not respond to the Complaint while their motion to compel  
5                   arbitration is pending. If the Court denies Defendants' motion to compel  
6                   arbitration, Defendants shall file their response to the Complaint within twenty-one  
7                   (21) days after the Court issues an order denying that motion; Plaintiff shall file any  
8                   opposition twenty-one (21) days following the filing of Defendants' motion to  
9                   dismiss; and Defendants shall file any reply fourteen (14) days following the filing  
10                  of Plaintiff's opposition.

11                  f. Any hearing on the motion to dismiss shall be held as the Court's calendar allows.

12                  g. The initial case management conference shall be continued to the second Thursday  
13                  following the motion to dismiss hearing at 9:30 a.m., with the deadline to meet and  
14                  confer pursuant to Federal Rule of Civil Procedure 26(f) set for 21 days prior to the  
15                  case management conference, and with the deadline for filing of the parties' joint  
16                  case management statement no later than seven (7) days prior to the conference.

17                  6. As explained above, on May 5, 2020, the parties stipulated pursuant to Local Rule  
18                  6-1(a) to extend Defendants' time to answer or otherwise respond to the Complaint. *See* ECF  
19                  No. 14. The parties have not previously stipulated to any other extensions of time.

20                  The parties therefore agree and stipulate to the above dates.

21  
22                  [Signatures on following page]

1 Dated: May 26, 2020

Respectfully Submitted,

2  
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10 Attorneys for Defendants Ticketmaster LLC  
11 and Live Nation Entertainment, Inc.

12 Dated: May 26, 2020

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 Dated: May 27, 2020

22  
23 Hon. Edward M. Chen  
24 United States District Judge